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July 9, 2020

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Asa Saint Clair*, 19 CR 790 (PKC)

Dear Judge Castel:

I represent Asa Saint Clair in the above-captioned proceeding. The case is scheduled to be heard on July 16, 2020 at 11:00 A.M. for a status update. I write to respectfully request that the matter be adjourned to any date in late September 2020 that is convenient for the Court. I make this request because of the outbreak of the Novel Coronavirus and its impact on this matter. As the Court is aware, Mr. Saint Clair is currently in Scottsdale, Arizona on home detention. As the Court is also aware, there is a voluminous amount of discovery in this matter that I need to go review with Mr. Saint Clair. I informed the Court at the previous conference that my plan prior to the July 16 conference would be to have Mr. Saint Clair fly to New York so we can review the discovery together after which I would inform the Court about our plan going forward. I recently informed the Government that my plan has been frustrated by the current outbreak in Arizona and the requirement that any persons traveling from there to New York would have to quarantine for 14 days. I also informed the Government that to address this issue I am in the process of uploading all the discovery to a cloud server and will be reviewing the documents with Mr. Saint Clair remotely, however, the process cannot be completed in any meaningful way by the July 16 conference due to the voluminous nature of the discovery. Accordingly, I am asking for this continuance. The Government does not object. I am mindful of the Court's preference in moving this case along and intend to be ready to proceed, one way or another, by September 2020.

This is my third request for an adjournment by letter motion. My previous request to adjourn from March 20 to March 27 was made to accommodate my schedule and the second was due to the initial outbreak of the health crisis in late in March.

There is no question that should the Court grant the continuance, the ends of justice would be served and that the taking of the action would outweigh the interests of the public and Mr. Saint Clair in a speedy trial.

Respectfully Submitted,

/s/

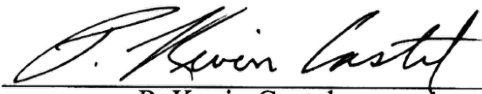
John P. Buza

cc.: AUSA Kiersten Fletcher (via ECF)
AUSA Tara LaMorte (via ECF)

Upon the application of defense counsel, consented to by the government, the conference originally scheduled for July 16, 2020 is adjourned to September 21, 2020 at 11:00 a.m. in Courtroom 11D. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The reasons for this finding are that the grant of the continuance is necessary in light of the National Emergency arising from the COVID-19 pandemic. Time is needed to allow defense attorney to meet and review discovery with his client. Accordingly, the time between today and September 21, 2020 is excluded.

SO ORDERED.

Dated: July 9, 2020



P. Kevin Castel
United States District Judge